Case 1:03-cv-12428-WGY Document 18 Filed 08/02/2004 Page 1 of 3

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

BRAUN GmbH,

Plaintiff,

v.

Civil Action No. 03-CV-12428 (WGY)

REMINGTON PRODUCTS COMPANY, LLC,

Defendant.

## **DECLARATION OF GEBHARD BRAUN**

- I, GEBHARD BRAUN, declare under penalty of perjury under the laws of the United States of America as follows:
  - 1. I submit this Declaration in support of Braun's Motion to Correct Inventorship.
- 2. I am the named inventor on U.S. Patent Nos. 5,711,328 and 5,649,556 (collectively, the "patents-in-suit").
- 3. From 1968 until I retired in 1995, I was an employee of Plaintiff Braun GmbH, and its predecessor Braun Aktiengesellschaft. I will use the term "Braun" to refer to both entities.
- 4. From 1992 to 1995, I worked under the supervision of Dr. Dietrich Pahl, Director of Research and Development for shavers in Braun's Product Development Group.
- 5. In 1992, Dr. Pahl asked me to develop further a device for cleaning dry shavers (the "cleaning center") that he had been developing. He showed me technical drawings, functional models and a prototype of the cleaning center.
- 6. From 1992 until my retirement in 1995, I worked to develop and improve the cleaning center.
- 7. On July 22, 1993, I filed an internal invention disclosure for a device to clean dry shavers with the Patent Department at Braun. The internal invention disclosure described

Dr. Pahl's cleaning center as well as certain of the improvements that I had developed under Dr. Pahl's supervision. I attached to this declaration a copy of the internal invention disclosure as Exhibit A, as well as a certified translation as Exhibit B. On September 15, 1993, I filed an invention disclosure addendum. I attach to this declaration a copy of the addendum as Exhibit C, as well as a certified translation as Exhibit D.

- 8. With Dr. Pahl's approval, the internal invention disclosure named me as the sole inventor of the device to clean dry shavers.
- 9. On January 26, 1994, Braun filed German patent applications based on the internal invention disclosure, naming me as the sole inventor.
- 10. In January of 1995, Braun filed two applications in the United States based on the German patent applications and my internal invention disclosure. I retired from Braun shortly thereafter, and I was minimally involved in the prosecution of the U.S. patent applications. Consistent with the inventorship listed on the corresponding German patent applications, I signed an Inventor's Declaration as the sole inventor of the patents-in-suit.
- 11. At the time I signed the Inventor's Declaration for the U.S. patent applications, I was not aware of any differences between German and U.S. patent laws.
- 12. Based on his development of the cleaning center and his subsequent collaboration with me while he was my supervisor, I believe that Dr. Pahl is a co-inventor with me on the patents-in-suit.
- 13. I do not object to amending the inventorship of the patents-in-suit to add Dr. Pahl as a co-inventor to the patents-in-suit.
- 14. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

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Executed on July [<u>14</u>], 2004 Kelkheim, Germany

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